

February 6, 2020

House Committee on Energy and Environment
Oregon State Capitol
900 Court Street NE, Room 347
Salem, OR 97301

Chair Power and Members of the Committee:

The Association of Oregon Recyclers (AOR) is a trade association focused on advancing waste prevention and recycling in Oregon.

If passed, SB 4093 would expand what qualifies for an exemption from existing solid waste and recycling statutes for “wood waste residues” (ORS 459.007). AOR is concerned about this bill because it would exempt these materials from the definition of solid waste. Our association is very supportive of the economic development and forest health aspects, but is very concerned about the unintended consequences that could lead to environmentally detrimental outcomes.

One of the impacts of exempting this material would be the removal of DEQ’s authority to regulate the management of wood residue. There are many potential environmental and human health risks of weakening DEQ’s regulatory authority, including discharge or leaching to surface or groundwater from waste storage piles. Combustion and the potential for stationary materials to attract vectors and other nuisances could be other additional risks. AOR is also concerned that removing wood waste residue from the definition of solid waste opens the door to applying the exemption to other materials such as yard debris.

We believe this is a complicated issue that needs more discussion beyond the time allowed in a short session. In addition, AOR is concerned the bill is potentially legislating based on the need of a single facility that is currently under consideration by DEQ for a permit. For those reasons and the other concerns stated above, we hope this legislation as written will not move forward and the issue can be further examined or an alternate solution found.

Sincerely,



Alison Briggs-Ungerer
Chair, Association of Oregon Recyclers

Chair: Alison Briggs-Ungerer
Briggs-Ungerer Consulting,
LLC

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